

The Honorable JOHN C. COUGHENOUR

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

MYRIAM ZAYAS,

**Plaintiff,**

V.

LINDA NGUYEN ET AL.,

### Defendants.

NO. 2:21-cv-00746-JCC

DECLARATION OF BRENDAN  
LENIHAN IN SUPPORT OF  
DEFENDANTS JAMAAL MAGEE  
AND JULIE DECAMPS' MOTION  
TO DISMISS

Brendan Lenihan hereby declares as follows:

1. I am over the age of 18 and am competent to testify about the matters stated herein.

I am an Assistant Attorney General, and I represent Defendants Jamaal Magee and Julie DeCamp in this case. As such, I am familiar with the contents of the case file in the matter. I make this declaration based on my personal knowledge and the records in this case.

2. ***Exhibit 1*** of this declaration is a true and correct copy of the Amended Dependency Petition, dated March 16, 2020, and filed in King County Superior Court Juvenile Division, cause number 20-7-00666-0 KNT.

3. ***Exhibit 2*** of this declaration is a true and correct copy of the Order to Take Child Into Custody and Place in Shelter Care, dated March 16, 2020, and filed in King County Superior Court Juvenile Division, cause number 20-7-00666-0 KNT.

1       4.     ***Exhibit 3*** of this declaration is a true and correct copy of the Shelter Care Hearing  
 2 Order, dated March 17, 2020, and filed in King County Superior Court Juvenile Division, cause  
 3 number 20-7-00666-0 KNT.

4       5.     ***Exhibit 4*** of this declaration is a true and correct copy of the Order Continuing  
 5 Fact-Finding/Trial, dated July 6, 2020, and filed in King County Superior Court Juvenile Division,  
 6 cause number 20-7-00666-0 KNT.

7       6.     ***Exhibit 5*** of this declaration is a true and correct copy of the Pretrial Conference  
 8 Order, dated August 24, 2020, and filed in King County Superior Court Juvenile Division, cause  
 9 number 20-7-00666-0 KNT.

10      7.     ***Exhibit 6*** of this declaration is a true and correct copy of the Order of Dependency  
 11 as to mother, Myriam Zayas, dated October 8, 2020, and filed in King County Superior Court  
 12 Juvenile Division, cause number 20-7-00666-0 KNT.

13      8.     ***Exhibit 7*** of this declaration is a true and correct copy of the Permanency Planning  
 14 Order, dated May 7, 2021, and filed in King County Superior Court Juvenile Division, cause  
 15 number 21-7-00531-9 SEA.

16      9.     ***Exhibit 8*** of this declaration is a true and correct copy of the Petition For  
 17 Termination of Parent Child Relationship, dated August 11, 2021, and filed in King County  
 18 Superior Court Juvenile Division, cause number 21-7-00531-9 SEA.

19      10.    ***Exhibit 9*** of this declaration is a true and correct copy of the Order Setting  
 20 Termination of Parental Rights Case Schedule, dated August 12, 2021, and filed in King County  
 21 Superior Court Juvenile Division, cause number 21-7-00531-9 SEA.

22      11.    ***Exhibit 10*** of this declaration is a true and correct copy of plaintiff Myriam Zayas'  
 23 former lawsuit against defendant Jamaal Magee, dated July 17, 2020, and filed in US District Court  
 24 for the Western District of Washington, cause number 2:20-cv-01001-RSM.

12. ***Exhibit 11*** of this declaration is a true and correct copy of the Order of Dismissal with Prejudice against defendant Jamaal Magee, dated October 6, 2020, and filed in US District Court for the Western District of Washington, cause number 2:20-cv-010001-MAT.

13. ***Exhibit 12*** of this declaration is a true and correct copy of Judgment in a Civil Case, dated October 6, 2020, and filed in US District Court for the Western District of Washington, cause number 2:20-cv-010001-MAT.

14. ***Exhibit 13*** of this declaration is a true and correct copy of plaintiff Myriam Zayas' former lawsuit against defendant Julie DeCamp, dated June 10, 2020, and filed in US District Court for the Western District of Washington, cause number 2:20-cv-00650-TLF.

15. ***Exhibit 14*** of this declaration is a true and correct copy of the Order of Dismissal with Prejudice against defendant Julie DeCamp, dated October 8, 2020, and filed in US District Court for the Western District of Washington, cause number 2:20-cv-00650-TLF.

16. ***Exhibit 15*** of this declaration is a true and correct copy of the Order of Dismissal dated August 19, 2021, and filed in US District Court for the Western District of Washington, cause number 2:20-cv-007467-JCC.

I declare under penalty of perjury of law under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED in Olympia, Washington on this 14<sup>th</sup> day of October 2021.

*/s/ Brendan Lenihan*  
BRENDAN LENIHAN, WSBA No. 56066  
Assistant Attorney General

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of October 2021, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Electronic Service to:

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RAAM WONG  
King County Prosecuting Attorney  
500 Fourth Avenue, Suite 900  
Seattle, WA 98104  
[Raam.Wong@kingcounty.wa.gov](mailto:Raam.Wong@kingcounty.wa.gov)

**Mailed Copy to:**

MYRIAM ZAYAS  
Plaintiff, Pro Se  
27369 129<sup>th</sup> Pl SE  
Kent, WA 98030

/s/Brendan M. Lenihan

BRENDAN M. LENIHAN, WSB No. 56066  
Assistant Attorney General